

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

LAMAR WRIGHT,	) CASE NO.: 1:17-CV-02503
	)
Plaintiff,	) JUDGE: DONALD C. NUGENT
	)
vs.	) <b><u>JOINT MOTION FOR EXTENSION OF</u></b>
	) <b><u>TIME IN WHICH TO FILE A NOTICE</u></b>
CITY OF EUCLID, et al.,	) <b><u>OF DISMISSAL WITH PREJUDICE</u></b>
	)
Defendants	)
	)

Now come the parties, by and through undersigned counsel, and hereby jointly move this Honorable Court for an extension of time in which to file a notice of dismissal with prejudice. On September 17, 2020 the parties attended a mediation conference, during which they settled this matter. As a result of the mediation conference, Magistrate Judge Parker ordered the parties to file a dismissal with prejudice by October 31, 2020. Due to issues relating to payments of outstanding liens and establishing a structure settlement (Qualified Assignment), the parties jointly move for an extension of the deadline to file a dismissal with prejudice to November 23, 2020. This Motion is taken in good faith and without intention to cause delay.

Respectfully Submitted,

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*Counsel for Defendants City of Euclid, Euclid Police, Officer Kyle Flagg, #61, and Euclid Police Officer, Vashon Williams, #9*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2020, a copy of the foregoing Joint Motion for Extension of Time in Which to File a Notice of Dismissal with Prejudice was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/John D. Pinzone  
JOHN D. PINZONE (0075279)

Counsel for Defendants City of Euclid, Euclid Police Officer Kyle Flagg, #61, and Euclid Police Officer Vashon Williams, #9